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Attorneys for Plaintiffs
WYNDHAM VACATION OWNERSHIP, INC.,
WYNDHAM VACATION RESORTS, INC., and
WYNDHAM RESORT DEVELOPMENT
CORPORATION

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

WYNDHAM VACATION)	Case No. 8:24-cv-01747 DOC-ADS
OWNERSHIP, INC. a Delaware)	
corporation; WYNDHAM VACATION)	JOINT STIPULATION OF
RESORTS, INC., a Delaware corporation;)	DISMISSAL WITH PREJUDICE
WYNDHAM RESORT)	[FRCP 41(a)(1)(A)(ii)]
DEVELOPMENT CORPORATION; an)	
Oregon Corporation,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
MIRANDA DEMPSEY, APLC d/b/a)	
MCCROSKEY LEGAL, DEBT PRO)	
LEGAL, and MXM LEGAL, a California)	
professional law corporation; and)	
MIRANDA MCCROSKEY, ESQ., an)	
individual,)	

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE [FRCP 41(A)(1)(A)(II)]

Defendants.)

Plaintiffs WYNDHAM VACATION OWNERSHIP, INC., WYNDHAM VACATION RESORTS, INC., and WYNDHAM RESORT DEVELOPMENT CORPORATION (collectively “Wyndham”) and Defendants MIRANDA DEMPSEY, APLC d/b/a MCCROSKEY LEGAL, DEBT PRO LEGAL, and MXM LEGAL, a California professional law corporation; and MIRANDA MCCROSKEY, ESQ., an individual (collectively “Lawyer Defendants”) (Wyndham and Lawyer Defendants, together, the “Parties”), by and through undersigned counsel, jointly stipulate that the Parties vetted the proposed Stipulated and Consent Final Permanent Injunction Order (Dkt. 30-1) prior to its submission to the Court and determined that Dkt. 30-1 was compliant with Rule 1-500 of the California State Bar’s Rules of Professional Conduct and Rule 1-500’s successor, Rule 5.6.¹

Notwithstanding the foregoing, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, and as invited by this Court (Dkt. 31), the Parties further jointly

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¹ Indeed, injunctions akin to that proposed here have passed judicial muster in other jurisdictions. *See Bluegreen Vacations Unlimited, Inc., et al v. Timeshare Lawyers P.A., et al*, Case No. 1:20-cv-24681 (S.D. Fla. June 1, 2023) (Dkt. 483); *Wyndham Vacation Ownership, Inc., et al v. Slattery, Sobel & DeCamp, LLP, et al*, Case No. 6:19-cv-01908 (M.D. Fla. August 23, 2023) (Dkt. 1052).

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE [FRCP 41(A)(1)(A)(II)]

1 stipulate and agree to dismiss the above styled lawsuit, *with prejudice*, with each party to
2 bear its own attorney's fees and costs.

3
4 DATED: November 20, 2024

/s/ Ben Suter
BEN SUTER
KEESAL, YOUNG & LOGAN

6
7 GLENNYS ORTEGA RUBIN
(*admitted Pro Hac Vice*)
8 SHUTTS & BOWEN LLP

9 Attorneys for Plaintiffs
10 WYNDHAM VACATION OWNERSHIP,
11 INC., WYNDHAM VACATION
12 RESORTS, INC., and WYNDHAM
CORPORATION DEVELOPMENT

13
14 DATED: November 20, 2024

/s/ Amy Baker
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19 MIRANDA DEMPSEY, APLC d/b/a
20 MCCROSKEY LEGAL, DEBT PRO
21 LEGAL, and MXM LEGAL, a California
22 professional law corporation; and
MIRANDA MCCROSKEY, ESQ., an
individual.